

[REDACTED]

1 She knew where he was at all the time, him and Father in the
2 chancery office down at [REDACTED]. Father [REDACTED] was, and he
3 was my uncle. He was a good man as far as I know. With all
4 this stuff happening to me I sometimes, sometimes wondered
5 if he had problems, you know what I'm saying. It is hard to
6 look back, but he would come to the home and then, my dad's
7 house, I would call him Uncle [REDACTED], that's the kind of man
8 he was. Outside of the home it was Father [REDACTED], so there
9 is a big difference. He was a man, I mean I liked him
10 really.

11 Q. Going back to Knecht, tell me about other feelings that
12 you had during times that he was doing this to you? Did you
13 think that, did you think at the time that, that what he was
14 doing was not appropriate?

15 A. I knew it.

16 Q. You knew it?

17 A. I knew it wasn't right to do that.

18 Q. Did you like get sick thinking about it or lose any
19 sleep, break out in hives?

20 A. No, I used to cry a lot about it. I would go back and
21 like when we had an outhouse out there, and I would go back
22 and get a paper and clean it up when I was healing and that,
23 and I would cry and wonder why he did it.

24 Q. How about other times? That was after the first time
25 when he scrubbed you with the tooth brush?

[REDACTED]

1 A. Yeah.

2 Q. He actually tore the skin, right?

3 A. Well, he broke -- it was bleeding. It took a couple

4 weeks to heal, I think. I can't remember, you ask me

5 something 50 years ago, you know, how long it took to heal,

6 but I know it took a while because I had to hide it from mom

7 and dad and I had to hide it from the kids I was in school

8 with. I couldn't go to the urinal, I had to go to the pot,

9 you know, the toilet part.

10 Q. The stall?

11 A. The stall, and I couldn't go in -- big, long, they had

12 big, long, white urinals. I couldn't stand there and pee

13 like the rest of them and I remember hiding that. Then I

14 would always say, well, I got to take a shit, even as a kid,

15 you know.

16 Q. On other occasions, after that first occasion then on

17 other occasions when he would like be in the car, he'd take

18 your penis out, want to look at it, did you know that that

19 was inappropriate at the time?

20 A. Well, I knew it was but I couldn't talk about it. I

21 knew it was.

22 Q. Why couldn't you talk about it?

23 A. Because I was scared of him. I mean I, I don't know. I

24 mean it is strange to think that I sit here and say fear,

25 but it was fear, you were scared to do anything, and, you

[REDACTED]

1 know, a priest won't do that kind, kind of thing, you know.
2 In fact, I didn't even know boys did that kind of thing too.
3 I knew about boys playing with themselves but anything else
4 I didn't realize.

5 Q. So before Knecht did this to you, I mean I take it, had
6 you had any contact with any other boys, in other words
7 any --

8 A. No.

9 Q. -- call them -- you know, boys sitting around?

10 A. Only contact I had was when I pulled it out to take a
11 pee in the urinal and that's about it. But I mean there was
12 nobody playing with anybody or anything, that I can
13 remember.

14 Q. Was that, when this girl saw you masturbating under your
15 desk, was that the first time you had ever done that in
16 school?

17 A. I had done that a couple, two or three times but it was
18 under my trousers. I remember that was the first time I had
19 it out of my trousers. I used to wear corduroy. I remember
20 that was, I'm pretty certain there was two of them that saw
21 me that day. I remember [REDACTED] (phonetic), she
22 asked me, well, what are you doing, something like that.

23 Q. When did you first start masturbating? How old were
24 you?

25 A. 9, 10, somewhere in there I suppose, somewhere about

[REDACTED]

1 there, I think it was.

2 Q. Is this something that you just discovered, learned on
3 your own, or I mean, did something --

4 A. Yeah, I learned it on my own, wondering why I was
5 getting hard and everything. Pretty soon it felt good and
6 things like that.

7 Q. Go back to what Knecht did on these other occasions. I
8 want to set aside the one with the toothbrush occasion we
9 talked about, but I want to talk about these other occasions
10 when he would do that, like in the car or back in the
11 sacristy in the church.

12 Would you have any symptoms in terms of feeling sick
13 about it or crying about it, losing sleep over it, breaking
14 out in hives, because it bothered you?

15 A. It bothered me, I think. I know I used to lay and think
16 about it a lot before I went to sleep sometimes on the days
17 it happened, that bothered me and I remember that on the
18 days it would happen, you know, and I wouldn't say nothing
19 to nobody, I would just --

20 Q. Held it in?

21 A. Just held it in. I just learned a way to hold it in and
22 work around it.

23 Q. Did it affect your schoolwork at all, do you think?

24 A. I never was no great student but it might have. I mean
25 it wasn't, sometimes I would see him in the hallway, then I

[REDACTED]

1 would walk by, then I would think, he is going to come and
2 get me or something like that. Then I was more worried
3 about whether he was going to come and get me or not, I mean
4 things like that. It is hard to explain that, but I can
5 remember that fairly clear, he was going to get me again. I
6 kept worrying that he was going to get, do it again.

7 Q. Let's talk about O'Malley. Tell me about the first time
8 it happened with O'Malley, and what happened?

9 A. Well, there was only one real time it happened with
10 O'Malley and I had gone up to the top of the KC hall, and
11 guys were downstairs and he was there, and I was probably
12 about, I'd say 16, right around 16, maybe 15, 16 years old,
13 and I gone up to the top of the KC hall. There is a landing
14 come down like this made sort of like an L and then come
15 down again, and I had been upstairs. I had to go up to see
16 him, I can't remember what the hell for, probably the boiler
17 or the furnace.

18 I went up there and I, he come, walked down to this
19 middle landing, and then all he ever done then was he got --
20 he had a way of grabbing you, and he grabbed me from behind
21 and then started fondling my genital area.

22 I remember at the time I said something to him, knock it
23 off, something. All right. I can't remember exactly what I
24 said to him, exact words, but I threatened him and then I
25 felt guilty that I had threatened a priest.

[REDACTED]

1 Q. Did he actually put his hand in your pants?

2 A. No, they were there.

3 Q. It was outside your pants and he was grabbing your

4 crotch?

5 A. Grabbing my crotch and working, you know, just like I

6 would reach it down and do it to myself now, that was it,

7 and I remember a lot of la la (phonetic) and I remember

8 turning around, saying knock it off or I'll knock you on

9 your ass. I can't remember the exact words. I probably

10 said --

11 Q. You were about 16 when that happened?

12 A. Yeah, that was the only time that he really touched me.

13 Q. Why did you tell him to knock it off?

14 A. Because I got stimulated.

15 Q. You knew that what he was doing was inappropriate? You

16 didn't like it?

17 A. I didn't like it, I could feel him through the back of

18 my pants. I can remember that, yes. I mean there was no,

19 there was clothing between us, that is what I'm trying to

20 say. Then he was laughing and sort of a, he had a funny

21 kind of laugh when he was into that. I don't know how to

22 explain it.

23 Q. Was Father Knoch still alive then when that happened?

24 A. I think that was the first time he came there.

25 Q. That O'Malley did?

[REDACTED]

1 A. That he came, and then he went, then he came back again,
2 and then I think he came and stayed a little while, then he
3 left and came back again. I can't remember exactly what
4 years he was there and I have a hard time relating years and
5 the time. You know, I wasn't paying attention to anything
6 then in accordance with anything like that, but he was there
7 and then he left for a little bit, and then he came back
8 again. I remember he came to help Father Knecht and then he
9 left and then he come back as the new --

10 Q. Was the pastor?

11 A. But there was also a, I don't remember whether that was
12 before or after that. I think it was before O'Malley came.
13 There was a Father Sadislosky. He was up there for a while
14 too. I remember working under him, too, but there was never
15 nothing from him at all. I mean he was a different type of
16 sort.

17 Q. Father, what was his name again?

18 A. Father Sadislosky was the man's name.

19 Q. Was he there after Knecht was there?

20 A. That I can't remember.

21 Q. But you were still working at the church then though?

22 A. Yes, I was working at the church. We called him Father
23 Sad, I mean that was a nickname. It was a little hard to
24 pronounce for us kids, but he was a good gentleman. I liked
25 him.

[REDACTED]

1 So I remember that was one of the names and there was
2 somebody else in there. I can't remember though, it's come
3 and gone, but I would say it was in that, that would be
4 about it, I guess.

5 Q. And this incident with, there was only incident with
6 O'Malley then?

7 A. That's the only time I ever had him touching me. I
8 think it was probably because I was bigger or something, I
9 don't know.

10 Q. Were you still a student at St. Mary's when that
11 happened? Let's see, you graduated from St. Mary's in '49,
12 the school year '49 to '50?

13 A. I had to have been.

14 Q. Okay.

15 A. No, wait a minute. Yeah, it must have been. I don't
16 know. There is where I'm having troubles.

17 Q. You said you were about 15 or 16 years old?

18 A. Yes, the first time he ever messed with me, but then I
19 [REDACTED] later.

20 Q. You [REDACTED] at St. Mary's?

21 A. Later on.

22 Q. Tell me about that?

23 A. Well, I [REDACTED] team, and I remember that
24 at, one day that he had one of the kids cornered like me.
25 He had on, he had on the short gym pants and jock strap. I

EXHIBIT B

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1 Q. And [REDACTED] last name?
 2 A. [REDACTED]
 3 Q. Were these all fellows that he had gone to school with?
 4 A. No.
 5 Q. Obviously Mike was his brother, right?
 6 A. Correct.
 7 Q. And then [REDACTED], that was someone he had gone to
 8 school with?
 9 A. Since kindergarten.
 10 Q. And [REDACTED], he had gone to school with him, right?
 11 A. I think since 8th grade.
 12 Q. And how about [REDACTED]?
 13 A. Yes.
 14 Q. [REDACTED]?
 15 A. Neighbor.
 16 Q. Neighbor from?
 17 A. G Street.
 18 Q. Do you know if he went to Assumption?
 19 A. I do not.
 20 Q. Do you know if he went to Prep?
 21 A. He did not.
 22 Q. How about [REDACTED] help me with his last name again?
 23 A. [REDACTED]
 24 Q. [REDACTED] did he go to Assumption?
 25 A. No.

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1 Q. And how about Prep?
 2 A. No, I actually don't know if he went to Assumption, I
 3 shouldn't say no, because I know they are Catholic.
 4 Q. How about [REDACTED]?
 5 A. [REDACTED]? Assumption.
 6 Q. And do you know if he went to Prep?
 7 A. Yes, he did.
 8 Q. And then there was an [REDACTED]?
 9 A. Neighbor.
 10 Q. You don't know if he went to school with Tim?
 11 A. He did not. And I said [REDACTED], didn't I?
 12 Q. [REDACTED]?
 13 A. [REDACTED]
 14 Q. Was he a school mate?
 15 A. Yes.
 16 Q. You said that you over the years had suspected that
 17 [REDACTED] had been abused by O'Donnell?
 18 A. Uh-huh, well, not, I didn't say by O'Donnell.
 19 Q. All right. Did you suspect that he had been abused by
 20 O'Donnell?
 21 A. I suspected.
 22 Q. All right. Was there any other, anybody else in that
 23 group that you had the same suspicion?
 24 A. No, but I thought some of them were weird.
 25 Q. Weird in what way?

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1 A. Well, [REDACTED], he can't, he is not married, not committing
 2 to anything. Tim's brother can't commit, can't have
 3 responsibility. [REDACTED] drinks too much.
 4 Q. Anybody else?
 5 A. No. I think that's it. I think, did [REDACTED] ever go
 6 camping with them, I don't know.
 7 Q. [REDACTED] who?
 8 A. I don't know his last name but I don't think he went. I
 9 can't remember if he went camping.
 10 Q. Would these guys always go camping in the same place?
 11 A. No.
 12 Q. But they would go on an annual basis?
 13 A. Yes.
 14 Q. Was there ever any year that you can remember that they
 15 missed a camping trip?
 16 A. No.
 17 Q. And would this be like a weekend camping trip?
 18 A. Yes, it would.
 19 Q. What would they do, fish, hunt, do you know?
 20 A. Be kids kthey called it the primal release so they
 21 just --
 22 Q. Primal release?
 23 A. Yeah, they had a whole bunch of funny names for it and
 24 they would just be messy and make up games and --
 25 Q. Did they ever take wives or girlfriends?

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1 A. Never, oh, no.
 2 Q. In the summer of 2002, did they have this camping trip?
 3 A. They do it on, near opening of fishing season so it is
 4 the spring of 2002, yes, they did.
 5 Q. And do you know where they went?
 6 A. They had lately been fluctuating between this place that
 7 I think is called Sun Lakes, and then this other place that
 8 is at the south end of, is it Lake Roosevelt. So I am not
 9 sure which place they went to.
 10 Q. All right. Did they have campers or did they use tents?
 11 A. Primarily cars and tents.
 12 Q. All right. In the spring of 2002, when Tim came back
 13 from that camping trip with his friends, did you notice
 14 anything unusual about him?
 15 A. No.
 16 Q. All right. Did he ever say anything to you that on
 17 these camping trips that they had discussed O'Donnell?
 18 A. I asked him. And he said they made fun of him, they
 19 usually just made, sometimes they would make fun of him.
 20 Q. When did you ask him about whether or not they discussed
 21 O'Donnell on these camping trips?
 22 A. When he got home.
 23 Q. How many times did you ask him that?
 24 A. However many times he went, probably every single time.
 25 Q. And why would you ask him that?

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1 A. I was just waiting for something to come forward.
 2 Q. And his response to you would be that they would make
 3 fun of him?
 4 A. I think they joked, made jokes.
 5 Q. What kind of jokes?
 6 A. I don't remember. I don't even know that he told me.
 7 Q. Did you ever talk with Mike, before Tim's death did you
 8 ever talk with Mike about O'Donnell?
 9 A. Mike who?
 10 Q. Mike [REDACTED].
 11 A. Rarely, if I did.
 12 Q. Do you have any specific recollection of ever discussing
 13 O'Donnell with Mike [REDACTED]?
 14 A. I have a recollection of the day that we were sitting in
 15 [REDACTED] in the eighties he was there.
 16 Q. Do you have any recollection of what he would have said
 17 if anything, about --
 18 A. I remember him looking down sitting on the fireplace
 19 hearth, and just we are okay, mom, nothing happened, we were
 20 okay. You know, she was asking.
 21 Q. Is it your recollection that she was concerned at the
 22 time that O'Donnell had done something to Mike and Tim?
 23 A. Yes?
 24 Q. And then you have a specific recollection that both Mike
 25 and Tim denied that anything had happened?

1 MR. ARPIN: I'll have to think about that one but --
 2 Q. Now I'm talking about before Tim's death?
 3 A. Yes.
 4 Q. If you have had any, do you remember any other
 5 conversations that you would have had with Mike [REDACTED]
 6 about O'Donnell?
 7 A. No.
 8 Q. How about, how about the other fellows that you
 9 mentioned that Tim would go camping with?
 10 A. No.
 11 Q. You never discussed O'Donnell with them?
 12 A. No.
 13 Q. How about their wives?
 14 A. I think I talked with [REDACTED] once. Not about
 15 O'Donnell, I guess, more about is [REDACTED] okay.
 16 Q. So back to the time then that you were in the car going
 17 on your vacation trip, Tim asked you to read this article in
 18 the paper?
 19 A. Uh-huh.
 20 Q. So you read him the article, is that right?
 21 A. Yes.
 22 Q. And then was there any discussion about O'Donnell after
 23 you read the article?
 24 A. He was driving, it was mostly me talking, very little
 25 discussion, you know, a little bit, maybe, very little and

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1 A. Tim didn't say anything, he never talked.
 2 Q. But Mike said that they are okay?
 3 A. Yeah, something to that effect. He mentioned something
 4 that day. But I don't remember what it was, because since
 5 then he told me other things so, and the part he told me, is
 6 it private, he is in the lawsuit?
 7 Q. No, you can tell me what he told you?
 8 MR. KOSNOFF: Things that you have communicated with but
 9 things that you may have spoken to him about --
 10 A. It is when I'm with you.
 11 MR. KOSNOFF: Okay, well, then we would assert the
 12 privilege.
 13 A. It is only in the, we only talk in the context of being
 14 with Tim or Mike Pfau.
 15 Q. (BY MR. ARPIN) So you have had discussions with Mike
 16 [REDACTED] about O'Donnell since Tim's death?
 17 A. Since Tim's death --
 18 Q. About things that O'Donnell had done, is that correct?
 19 A. Correct.
 20 Q. But on those occasions Tim Kosnoff or Mike Pfau were
 21 present as well?
 22 A. Yes.
 23 Q. So you're asserting the privilege on those
 24 communications?
 25 MR. KOSNOFF: Yeah.

1 we were on subject of what was next, which was the vacation
 2 or the stop or --
 3 Q. What was his response while you were reading this
 4 article? I mean, did he have any visible response that you
 5 could see?
 6 A. No response at all.
 7 Q. He didn't say anything regarding the article?
 8 A. No, I, I found a response when we got home from the
 9 vacation, and he said, "Where is that paper?" And I said,
 10 "What paper are you talking about?" He goes, "The one that
 11 made it all the way on vacation and back." And I said, "You
 12 mean the one with the article of Father Pat?" And he said
 13 yes. I said, "Well, Tim, I recycled it. I don't, it's
 14 gone." He goes, "Oh, okay." I said, "Did you want to keep
 15 it? Oh, nothing, nothing." And he just walked out the
 16 door.
 17 Q. All right. Then what was the next thing that happened
 18 regarding O'Donnell?
 19 A. The next thing that happened was another article in the
 20 paper.
 21 Q. This was after you got back from your trip then?
 22 A. Yes, we got back on the 17th, I think it was Sunday,
 23 whatever the Sunday was.
 24 Q. Was this in July or August?
 25 A. This was in August.

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1 Q. All right.
 2 A. And it almost seems to me and I don't study for this
 3 deposition, but it almost seems to me that there was an
 4 article somewhere in the, between the 17th and the 25th in
 5 the paper, it just, it seems right, but then on the 29th
 6 there was a front page article with O'Donnell's picture
 7 right in the right, bottom right corner as I recall, and it
 8 was a picture of him as he looked at Assumption.
 9 And I usually get up in the morning and walk, and then
 10 I'm done by 7 or quarter to 7 and then we sit every morning
 11 and have breakfast or coffee or whatever, he eats breakfast
 12 for sure.
 13 Q. Was this a weekday?
 14 A. This was Thursday morning. And what he did, what I
 15 decided was I wasn't going to walk because I wanted to
 16 sit -- he was already eating so I wanted to sit by him. And
 17 he said, "Look who is in the paper?" And he pointed to the
 18 front page there, and I said, "O'Donnell again?" And he
 19 said, "Read it." And so I read it and then he said, "No,
 20 finish it." And he started grabbing the paper, "I'll get
 21 it," you know, and I found the middle section. He goes,
 22 "Now read this." And the second section of the article
 23 continued on a different page, and I continued to read it
 24 and it talked about a suicide of a man near Rosalia, and I,
 25 I was kind of shocked that he made me read something because

1 could make it through the day and we can talk at night. So
 2 I kissed him, he kissed me and he hugged me and just like
 3 normal. He never came home.
 4 Q. Want to take a break?
 5 MR. KOSNOFF: Want to keep going?
 6 A. It's okay. Some water.
 7 (Short recess was taken.)
 8 Q. (BY MR. ARPIN) When was next that you heard anything
 9 about Tim then?
 10 A. I guess you have to ask this. My daughter and I went to
 11 kindergarten orientation, oh, the next that I heard from
 12 Tim?
 13 Q. That you heard anything from him or about him.
 14 A. From him? Actually it was that, it was that, I can, we
 15 went to kindergarten orientation, our school was walking so
 16 Kaelah and I walked up there. Then we walked back home, and
 17 as we were walking, I saw a blue car in front of the house,
 18 but I wasn't sure if it was in front of our house, because
 19 we were walking on the street and it's straight ahead of us.
 20 So I said, Kaelah, I think we have to run. I think that,
 21 that there is a person going to our house.
 22 And so we got, we ran all the way down the rest of the
 23 street and met a man in our driveway, and he said, "Could I
 24 come in?" And I said, "No. Who are you, you know, who are
 25 you that you want to come in?" And well, he said, "Are you

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1 that was not ordinary for him. He most of the time tells me
 2 to read geology, you know and the outdoor section of the
 3 paper, not the -- and so I, he got up from the table and he
 4 put his bowl in the sink, and I went over to the sink and I
 5 looked at him, and I said, "What are you telling me?" And I
 6 said, are you, were you abused by Father Pat?" And he looked
 7 down, he said no.
 8 And I said, Tim, and he turned his -- I had my hand on
 9 the side of his face, he turned his head away so I put my
 10 hand on his arm, I said, "Tim, did you get naked in front of
 11 Father Pat?" He said yes. He was looking kind of down that
 12 way. And I said, "Tim, did Father Pat touch you in the
 13 privates?" And he said yes. I said, "Tim, I just asked you
 14 if Father Pat abused you. You said no." I said, "When you
 15 are naked in front of Father Pat and when he touches your
 16 privates, that is abuse." And he just nodded and he left,
 17 he left me. He just went out, back to the back bedroom.
 18 And I sat down, and I, I was spinning, literally
 19 spinning, and, you know, so many things were going through
 20 my head. And what kept going through my head was the guy
 21 has to go fix computers. He has two computers that were
 22 really hard. What is he going to do. How is he going to do
 23 it.
 24 So I got up, when he came back I got up and I thought,
 25 well, maybe if I pretend that we didn't say anything that he

1 Cheryl Corrigan?" And I said -- he said, "I'm a policeman
 2 with the police department. I'm a chaplain with the police
 3 department." And I said, "Well, how I would know that? You
 4 need to show me your ID because I can't let people in my
 5 house." And he showed me his ID and his police badge and
 6 said, Could I come in now?" And I said I think so. I
 7 wasn't really sure that I identified it correctly but he
 8 said, "Let's sit in the, here, and can your, do you have any
 9 anybody at home? Is there anybody here?" And I said, "Yes.
 10 My son Riley and his friend Michael." He said, "Is this
 11 your daughter? Yes. Can she go to where they are? Can I
 12 bring her down there?" I said sure. And I don't know if
 13 he -- I can't remember, I was a bit confused and then he
 14 said, sit down and we sat at the kitchen table, and he told
 15 me that Tim was found dead and I said, Tim who? He said Tim
 16 Corrigan. And I just said. "There is three Tim Corrigan
 17 in Spokane. Which Tim Corrigan?" And he said, well, this,
 18 "We believe it is your husband." You know and I cried and
 19 and he told me -- he allowed me to call the police woman or
 20 man, it was a woman on the scene to see what, to prove it,
 21 because I didn't believe him. And then he asked if I could
 22 if I wanted to call a pastor or somebody. And I, well, I
 23 was crying and crying, and we called a friend that's on
 24 staff at our church and, because we were in between pastors,
 25 we had just hired one that started August 1st. And he began

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1 calling for me and I think I talked to, I don't remember,
 2 just one person at a time and trying to get them over to
 3 tell, so he could tell them.
 4 Q. We have heard about a note that Tim left. Did you ever
 5 see such a note?
 6 A. Yes, I did.
 7 Q. And who had that?
 8 A. The police woman.
 9 Q. When did you see that?
 10 A. I don't know if it was that day or the next day, it is
 11 kind of a blur but shortly after.
 12 Q. Like a one-page note?
 13 A. Yes.
 14 Q. Handwritten?
 15 A. Handwritten.
 16 Q. Tim's handwriting?
 17 A. Yes.
 18 Q. What did it say?
 19 A. "It is nobody's fault."
 20 Q. Is that all it said?
 21 A. Uh-huh.
 22 Q. Yes.
 23 A. Yes.
 24 Q. Did he sign it?
 25 A. No.

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1 Q. Between the time that Tim left the house and you came
 2 back and found the police chaplain at the house had you
 3 talked with him on the phone at all?
 4 A. No.
 5 Q. So what were his last words to him, or excuse me, what
 6 were his last words to you?
 7 A. "I love you."
 8 Q. And about what time of the day was that that he left the
 9 house?
 10 A. 7:30 a.m.
 11 Q. On prior occasions you had asked him if O'Donnell had
 12 abused him and he had denied it. And so was this the first
 13 time that he ever stated to you then that O'Donnell had
 14 abused him?
 15 A. I want to clarify that he never denied. He would always
 16 say, "It didn't affect me."
 17 Q. All right.
 18 A. And this was the first time that I believe he put the
 19 two together.
 20 Q. Put what two together?
 21 A. What happened to him is called abuse.
 22 Q. I see. Did he give you any detail regarding what
 23 O'Donnell had done to him?
 24 A. No.
 25 Q. So then what was the next thing that happened then,

1 after you were notified of his death and you saw the note.
 2 What happened then in terms of people coming together or the
 3 services?
 4 A. I was crying for most of the year. It was, the first
 5 two weeks were just out of this world painful. The first
 6 two months, the first 10 months was very, very painful.
 7 Q. When was the funeral service?
 8 A. I think it was Monday.
 9 Q. The next Monday?
 10 A. I think so.
 11 Q. Where was it?
 12 A. At church. Garland church.
 13 Q. At your church?
 14 A. (Nods head affirmatively.)
 15 MR. ARPIN: Why don't we talk and early lunch break
 16 here. I'll put my notes together and see where I need to go
 17 next.
 18 (The noon recess was taken at 11:51. Deposition reconvened
 19 at 12:45 p.m. with the same parties present.)
 20 Q. (BY MR. ARPIN) We'll go back on record here. You're
 21 still under oath, Ms. Corrigan. According to your counsel
 22 you had some answers that you wanted to clarify or
 23 supplement --
 24 A. Right.
 25 Q. -- from earlier today so who don't you just tell us what

1 those clarifications would be?
 2 A. The first one was when you asked me how our marriage
 3 was. And I told you that everything that I have told you so
 4 far is true. The one area that was unique with us was the
 5 area of intimacy. Tim did not initiate sexual relations, I
 6 don't believe, even once in 16 years of marriage.
 7 He, by the time it was, I was 35 or so like 1995, I
 8 questioned, I didn't want to talk to him about it but I
 9 questioned whether this was normal. And I asked a gentleman
 10 that I baby-sat for his children, and I said is, how many
 11 times does a man want to have intimate relations with his
 12 wife, and he said, oh, probably twice a week or so. And he
 13 said why, and I said well, Tim doesn't ever. But yet he
 14 loves me and he treats me like I'm a queen, he adores me.
 15 He says I'm pretty, cute, you know, all the right things,
 16 but he does not initiate or want it, and the man's response
 17 was well, you know, we are all different. So I'm just
 18 talking from my own experience.
 19 And I said -- he said, there is varying degrees, I'm
 20 sure. And so he by saying that he put me at ease, and I
 21 just decided that this is what God gave me, and I was going
 22 to honor Tim the way he was and just, I never felt really
 23 deprived or anything, but at that time I was a little bit
 24 upset about it. But after that I just thought well, I'm
 25 lucky I, you know, I have a man that doesn't ever demand

EXHIBIT C

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1 Holidays at my house were, were hell. She would throw
 2 herself down the stairs. She once pretended to cut her
 3 wrists and I found her in the bathroom, stuff of that
 4 nature.
 5 Q. Had she had a problem with depression?
 6 A. I don't know.
 7 Q. Did she ever get any treatment for instance after she
 8 cut her wrists?
 9 A. I don't know. I was a kid.
 10 Q. Incidental to the fighting did you see physical striking
 11 of one another between your parents?
 12 A. My mother would strike my father, my father would push
 13 her away, and then him and I would get in his pickup and
 14 leave for a couple hours, the afternoon, the day sometimes.
 15 Q. And did your dad ever offer explanation, any
 16 understanding as to why your mother had this difficulty?
 17 A. No, and I never asked.
 18 Q. Is your mother still alive?
 19 A. Yes.
 20 Q. Do you still have any kind of a relationship with her?
 21 A. Yes.
 22 Q. How frequently do you see her?
 23 A. I talk to them probably three times a week and see them
 24 at least once a week.
 25 Q. And as far as their present relationship, is it improved

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1 beyond what you recall seeing as a child?
 2 A. Yes.
 3 Q. And how so?
 4 A. They get along great. They are very, they seem to be
 5 very happy. They show a lot of compassion toward me in
 6 everything that's happened in-regard to why I'm here today,
 7 and my divorce.
 8 Q. Okay. So in other words since you became a plaintiff in
 9 a lawsuit you have been receiving compassion from your
 10 folks?
 11 A. It's been before that.
 12 Q. Okay. Did your dad ever take you aside and explain how
 13 it happened that they were able to fix up their problems
 14 that you remembered from previously?
 15 A. No.
 16 Q. Did you ever get any understanding of that from your
 17 mom?
 18 A. No.
 19 Q. Ever talk about it?
 20 A. No.
 21 Q. Do you know whether they ever underwent any counseling
 22 or treatment?
 23 A. I have no idea.
 24 Q. Now did you ever experience any sexual abuse at home?
 25 A. No.

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1 Q. Did you ever experience any sexual abuse from anyone
 2 other than at the hands of Patrick O'Donnell?
 3 A. No.
 4 Q. Did you ever sexually abuse anyone?
 5 A. Absolutely not.
 6 Q. Now I understand this is uncomfortable to talk about,
 7 but of necessity, we do need to talk about it, and if you
 8 want to take a break or take a few minutes, that's fine
 9 anytime, but I need to ask you some specific questions about
 10 Patrick O'Donnell.
 11 Do you recall when you first met him?
 12 A. I remember I was in junior high or just entering late
 13 grade school. He was coming around the school a lot, very
 14 popular with the kids, with the boys. They would flock to
 15 him like it was Christmas or something.
 16 Q. And this, this would have been at grade school?
 17 A. Correct.
 18 Q. Or the middle school?
 19 A. They are both combined, for the grade school, junior
 20 high class is right across the hall and then the upper
 21 junior high is down the hall a ways.
 22 Q. Okay, and when you said that he would show up there at
 23 the school, would there be a specific occasion?
 24 A. No, daily.
 25 Q. At recess, did he come in the classroom, what were the

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1 circumstances?
 2 A. He would come I believe periodically throughout the day,
 3 on any given day, and after school he was involved in, if we
 4 were playing basketball or something to that nature he
 5 would, he would participate.
 6 Q. How would he participate?
 7 A. He would play. He would --
 8 Q. Was he ever in the capacity of any assistant coach
 9 position at the school?
 10 A. I believe he was an assistant coach.
 11 Q. And would that have been the, the grade school or the
 12 middle school?
 13 A. I don't recall exactly.
 14 Q. And this would be, again this is a public school,
 15 correct?
 16 A. Correct.
 17 Q. And do you know if this was any kind of a paid position?
 18 A. I have no idea.
 19 Q. And was it through his working as an assistant coach
 20 that you really first had interaction with him?
 21 A. No, that came later. The interaction was at first
 22 curiosity, you know, everybody was talking about him, how he
 23 would, had a lake place on Coeur d'Alene and you could go up
 24 there and a boat and a hot tub and allow you to drive his
 25 car, just stuff that young boys thrived on, attention.

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1 Q. So did other people tell you that he had a place at Lake
2 Coeur d'Alene and a hot tub and a boat?
3 A. Yes. I learned it through my classmates.
4 Q. Whom did you learn that from?
5 A. I don't recall. It was, when he would come to school
6 the kids would swarm around him.
7 Q. Again is this recess or at classroom setting, what is
8 the circumstance?
9 A. Toward the end of the day, end of the day kind of thing,
10 he would come, you know, I believe toward the end of the day
11 and then kids would get to go with him up to the cabin. I
12 don't recall exactly who, at what time or anything.
13 Q. So it's not during class hours?
14 A. Occasionally, yes.
15 Q. Okay. If it's during class hours --
16 A. In between, excuse me, in between classes. In a small
17 school where there's 200 or under kids in kindergarten
18 through 12th grade it's very lax. It's very, it's
19 structured but it's very lax. We have time between classes,
20 we have time, you know, to talk and whatnot.
21 Q. And again do you recall the names of the specific
22 sources of information who first told you for instance he
23 had a lake place that you could go to?
24 A. I can recall people in my class, [REDACTED],
25 [REDACTED], older kids, just basically boys a year younger than

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1 me at that time all the way up to a freshman or so in
2 school. It was a very small school.
3 Q. And did they indicate they had gone to the lake place as
4 a for instance?
5 A. Yes. I recall that people had went up there and I can't
6 recall exactly what specific person said what, but it was
7 the talk, it was, you get to go to the lake and go hot
8 tubbing, water-skiing, swimming, fishing, sledding in the
9 wintertime, all the things that small town boys just don't
10 get to do a whole lot.
11 Q. When did you first make such a trip?
12 A. I believe I must have been about 12, going up to the
13 cabin, getting pizza, hot tubbing. I believe it was
14 wintertime.
15 Q. Going on the premise that your date of birth is 1968,
16 [REDACTED], at age 12 that would put the time of this in
17 1980, is that accurate?
18 A. Yes, probably either spring of 1980 or fall, I can't
19 remember, but I know there was snow or inclement weather.
20 Q. And did you go there with anyone else?
21 A. Yes. I can, it's hard for me to differentiate the
22 people each time, but I know --
23 Q. Let's take the first time, that's what I'm talking
24 about?
25 A. There is so many times I can't remember the specific

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1 first time.
2 Q. All right. Were there in fact other people who went
3 with you the first time?
4 A. Yes.
5 Q. And did anything untoward occur to you the first time?
6 A. Excuse me?
7 Q. Anything untoward occur to you the first time, any
8 sexual abuse?
9 A. No.
10 Q. Did the first time require some sort of parental
11 permission?
12 A. I believe I asked my parents, but because O'Donnell was
13 so accepted in our community my parents thought yes, no
14 problem. We can --
15 Q. So you asked for permission from your parents to go and
16 they agreed to let you go?
17 MR. KOSNOFF: Did you get a chance to answer the
18 previous question?
19 A. I don't know. I --
20 MR. KOSNOFF: Okay. I ask that the witness be permitted
21 to complete his answer.
22 Q. (BY MR. STONE) I guess I had a very specific question
23 and first of all it didn't seem to be responsive, but let me
24 start over.
25 Did you ask for permission to go with O'Donnell?

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1 A. I believe so. I was 12 years old. My parents would not
2 let me leave town with, without knowing where I was going
3 and with who.
4 Q. Understandable, and my question is, did you ask him, ask
5 to go, as opposed to Patrick O'Donnell asking your parents
6 if you could go?
7 A. I don't recall. I believe it was maybe mutual, where he
8 would come to my home and say, we are going to the lake, you
9 know, and I would be of course begging my parents to let me
10 go on this outing.
11 Q. So he would come to your home and ask your parents or
12 indicate in your parents' presence that he was going to his
13 lake place, and would you like to go?
14 A. Yes.
15 Q. Okay, and they would consent?
16 A. Yes.
17 Q. Now when is the first time that anything in your
18 recollection occurred that you would categorize as sexual
19 abuse?
20 A. Maybe two or three times down the road of going to the
21 cabin. We would sit, I remember it, it had to have been
22 winter or snow, and in the hot tub he would ask us to remove
23 our shorts because he said that they would plug the filter
24 on the hot tub. So we did. We, we did.
25 Q. How, when you say your shorts you're talking about

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1 swimming shorts or underwear?
 2 A. Swimming trunks.
 3 Q. Okay, and I take it from your answer that there is more
 4 than one of you in the hot tub other than O'Donnell?
 5 A. Correct.
 6 Q. And so the nature of the sexual abuse that you describe
 7 was the physical act of being nude?
 8 A. On those occasions in the hot tub that was one of them,
 9 yes.
 10 Q. Okay, and I want to, how many times would you say that
 11 you physically in a group were in a hot tub of his, of
 12 Patrick O'Donnell's when you were nude?
 13 A. Every time in the hot tub.
 14 Q. I don't know how many every time is?
 15 A. Every time.
 16 Q. Is it once, twice, three times, 20 times?
 17 A. More than I could count off the top of my head. I went
 18 there a lot.
 19 Q. When did you stop going there?
 20 A. It must have been about fall of '84, '85.
 21 Q. Just to have a clear understanding, the first time that
 22 you would have been there would have been either the spring
 23 or fall of 1980, and the last time you were there or had any
 24 participation with him in anything you would characterize as
 25 sexual abuse would have been in the fall of 1984 or 1985, is

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1 that correct?
 2 A. Correct.
 3 Q. On each of these occasions were you there in O'Donnell's
 4 presence in the presence of other people?
 5 A. Yes. O'Donnell had groups, people, different people
 6 that he would take up there, and it seemed when, sometimes
 7 when we went with a large group things didn't happen that
 8 would happen normally if it was a smaller, almost
 9 hand-picked group.
 10 Q. So in other words when you went with a large group
 11 nothing untoward occurred, except possibly what, nude hot
 12 tubbing? Did that occur in a larger group?
 13 A. I don't recall. I don't believe so.
 14 Q. You don't believe so, you don't believe that it occurred
 15 with a larger group?
 16 A. Correct.
 17 Q. Okay, and something like the nude hot tubbing, that
 18 would occur with a smaller group?
 19 A. Correct, almost a selected group.
 20 Q. And your characterization of a selected group, is that
 21 with the benefit of hindsight in assessing what was going on
 22 at this point in your life?
 23 A. It seemed that the abuse was stronger when it was just
 24 me and one other person.
 25 Q. And who was that other person?

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1 A. [REDACTED]
 2 Q. Were there times when just you, [REDACTED], and Patrick
 3 O'Donnell were at the lake place in Coeur d'Alene?
 4 A. Absolutely.
 5 Q. How many occasions?
 6 A. A lot.
 7 Q. Again, a hundred times, 200 times?
 8 A. I went --
 9 Q. Five times?
 10 A. -- to the lake two to three plus times a week times five
 11 years. I don't know the math but to me that's a lot.
 12 Q. Okay. Well, that helps quantify it.
 13 And would your frequency in going there depend upon the
 14 time of year?
 15 A. No.
 16 Q. And so you went there the same three to five, or excuse
 17 me, two to three times a week over these five years whether
 18 it was spring, summer or fall or winter?
 19 A. Went maybe a little more in the, when there was snow on
 20 the ground to check the cabin, to of course use the hot tub
 21 because it's very cold outside.
 22 Q. Do you know who owned the cabin?
 23 A. I thought he did. I don't know.
 24 Q. On any occasion were any adults present?
 25 A. Some occasions, yes.

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1 Q. Do you remember the names of any adults present?
 2 A. Darrell Kuhn.
 3 Q. What's the last name?
 4 A. Kuhn. I believe it's spelled K-U-H-N or something.
 5 Q. Okay, and who is he?
 6 A. He was a teacher at [REDACTED].
 7 Q. Was he your teacher?
 8 A. No.
 9 Q. Was he a coach?
 10 A. Yes. He was involved in sports, basketball, and I want
 11 to say baseball also.
 12 Q. And were you ever abused in any fashion or in the
 13 presence of Darrell Kuhn?
 14 A. Yes.
 15 Q. So you were abused by him?
 16 A. Correct.
 17 Q. And when did that first occur?
 18 A. I don't recall the exact date. It was at one time. It
 19 was at one period at the cabin. He would not come up there
 20 every time, but when he did come up there he abused.
 21 Q. Well, again to try to quantify this in some fashion, if
 22 you went two to three times a week over a five year period,
 23 what percentage of the time when you went would Mr. Kuhn be
 24 present?
 25 A. I would have to say approximately three to five times a

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1 month.
 2 Q. Any other adults?
 3 A. Not that I recall.
 4 Q. What was the nature of the abuse done to you by
 5 Mr. Kuhn?
 6 A. Fondling, playing sexual games in the hot tub.
 7 Q. Anything else?
 8 A. Not that I recall.
 9 Q. And in terms of the sexual games, what was the nature of
 10 the sexual games that were played?
 11 A. Dice was played a lot with I believe it was a cooler
 12 lid. You rolled dice, whoever got the highest number or the
 13 lowest number would go have to sit in the snow bank naked,
 14 run down to the lake and jump in the lake naked, go make
 15 snow angels in the snow naked.
 16 Another game was where he and O'Donnell would sit like
 17 across from each other on, in the hot tub, and you would
 18 basically just, just run, swim, play, whatever, around in a
 19 circle, and they would grab you and you could feel their
 20 erections. You could feel them grabbing, touching, groping.
 21 Q. So you could feel them physically touch you?
 22 A. Yes.
 23 Q. And did this cause you to have an erection?
 24 A. Yes.
 25 Q. And in turn you would feel that they had an erection?

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1 A. Yes. I could feel it on my behind.
 2 Q. And would they penetrate you from behind with their
 3 erections?
 4 A. O'Donnell did. I don't know about Kuhn. I don't know.
 5 Q. And did this occur in the hot tub?
 6 A. Sometimes. Sometimes in the living room, in the
 7 bedroom.
 8 Q. On how many occasions?
 9 A. A very good percentage of the times I went up there.
 10 Q. So three to five times a week over five years?
 11 A. I would say that's pretty good.
 12 Q. On these occasions that he would penetrate you from
 13 behind or Mr. Kuhn would, would this cause you physical
 14 pain?
 15 A. Yes.
 16 Q. Did it cause you anxiety?
 17 A. Yes.
 18 Q. Cause you to bleed?
 19 A. Sometimes.
 20 Q. Cause you any other discomfort?
 21 A. I would be sore for days. I was sore all the time.
 22 Q. Pardon?
 23 A. I was sore all the time.
 24 Q. Did you ever complain about that?
 25 A. I didn't know, I didn't understand who or what was

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1 happening. For me it was someone giving me attention,
 2 someone showing me affection, someone I thought honestly
 3 caring about me.
 4 Q. Were they giving you attention that you didn't get at
 5 home?
 6 A. I didn't get much attention anywhere.
 7 Q. What caused you to terminate these trips to the cabin?
 8 A. O'Donnell suddenly left town.
 9 Q. Do you know why? Or did you know why then, maybe that's
 10 a better question?
 11 A. I had heard speculation but, and rumors. Small towns
 12 are very good at rumors.
 13 Q. And what did you hear by way of rumor?
 14 A. I believe that he had accepted a position as a counselor
 15 or something on the coast, that somebody had made
 16 accusations against him for misconduct.
 17 Q. And do you know the nature of that misconduct, or did
 18 you then?
 19 A. No, I didn't then. I didn't, it was pretty hushed. All
 20 of a sudden he was gone and I didn't see him again for some,
 21 some time, some months until he returned briefly to visit.
 22 Q. Did you ever talk with O'Donnell regarding why it was
 23 that, or what the problem was?
 24 A. Which problem?
 25 Q. That caused him to leave?

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1 A. No.
 2 MR. STONE: Let's go off the record.
 3 (Discussion off the record.)
 4 Q. (BY MR. STONE) When did Mr. Kuhn stop the trips to the
 5 lake?
 6 A. I believe he only went for a year or so, maybe a little
 7 longer, somewhere in the interim between '80 and '85, maybe
 8 '82, somewhere in there, '83 maybe.
 9 Q. So I'm, just so I'm understanding, in the five year
 10 period between roughly 1980 and I think you indicated 1985
 11 your recollection is Mr. Kuhn was making these trips to the
 12 lake cabin for about a year, roughly between 1982 and 1983,
 13 is that accurate?
 14 A. I believe so, somewhere in there.
 15 Q. Okay. Was Mr. Kuhn physically present at the times that
 16 you were physically penetrated by Patrick O'Donnell?
 17 A. I don't understand physically present. Do you mean was
 18 he standing there, was he participating?
 19 Q. Or in close proximity, any of the above?
 20 A. I would say he was in close proximity.
 21 Q. Like within a foot or two?
 22 A. Within the room.
 23 Q. Was he watching?
 24 A. I don't recall.
 25 Q. Okay. Do you recall him masturbating while this other

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1 was in progress?
 2 A. I don't recall.
 3 Q. Did you ever engage in masturbation of Mr. Kuhn?
 4 A. I don't understand?
 5 Q. Do you know what masturbation is?
 6 A. Correct.
 7 Q. Okay. Did he ever masturbate you?
 8 A. Him and O'Donnell, yes.
 9 Q. Okay. Did you ever masturbate Mr. Kuhn?
 10 A. Yes.
 11 Q. And did you masturbate Patrick O'Donnell?
 12 A. Yes.
 13 Q. And again in terms of frequency, more times than you can
 14 count?
 15 A. Possibly, yes.
 16 Q. You are not sure?
 17 A. I can't give a specific amount. I know it was, it was
 18 pretty frequent.
 19 Q. Okay. Let's say prior to your first trip to the lake
 20 cabin, and I believe you indicated that would have been
 21 roughly 1980, is that accurate?
 22 A. Somewhere in there, yes.
 23 Q. Had you engaged in masturbation at that point in your
 24 life?
 25 A. No.

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1 Q. What was your first experience with masturbation?
 2 A. That would be O'Donnell doing it to me.
 3 Q. Okay, and was anyone else present?
 4 A. I don't believe so.
 5 Q. And how long would this have been after you started
 6 these visits to the lake?
 7 A. Within four months, months maybe.
 8 Q. So the first time that he physically masturbated you
 9 would have been about four months after you started these
 10 trips to the lake, is that right?
 11 A. Correct.
 12 Q. Would any of these abusive sessions take place at
 13 locations other than at Lake Coeur d'Alene?
 14 A. Yes.
 15 Q. Where?
 16 A. His, I don't know what you would call it, the church,
 17 the living quarters of the church. I'm not familiar with
 18 what it's called.
 19 Q. Is it called the, was it a house?
 20 A. It was like an annex directly across from the church
 21 where he resided.
 22 Q. Did anyone else reside there?
 23 A. No.
 24 Q. And when was the first occasion that one of these
 25 abusive events took place at the house?

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1 A. It must have been sometime in the fall of 1980, shortly
 2 after things occurred at the cabin.
 3 Q. And you mentioned going to the cabin some three to five
 4 times weekly over a five-year period.
 5 How many times did you visit the house in addition to
 6 going to the cabin with that frequency?
 7 A. Quite a few. I would -- I thought he was my friend. I
 8 thought, I didn't know what I, I thought. I was so
 9 confused. I went to see him, I would go down there on a
 10 Saturday or a Monday or after school if we weren't going to
 11 the cabin or he would be at the school playing basketball,
 12 assisting with the team, partaking in the practices.
 13 Q. Along with Mr. Kuhn?
 14 A. Kuhn wasn't my basketball coach. I didn't have anything
 15 to do with him in sports.
 16 Q. Okay. Was he a basketball coach at the high school?
 17 A. After some time had passed and I had begun in high
 18 school, I believe he was then the coach of the junior high.
 19 Q. Okay. So, but by that time you had gone up to high
 20 school level and he was then coaching at the junior high
 21 level, is that right?
 22 A. I believe so, like the 7th or 6th grade or somewhere in
 23 there.
 24 Q. And when did Patrick O'Donnell stop assisting or playing
 25 basketball with the kids at school?

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1 A. He always would practice, and pretty much up through
 2 freshman, freshman or so in high school.
 3 Q. So when you went on then to be in high school, at the
 4 high school level playing, were you playing basketball then?
 5 A. Correct.
 6 Q. Did he serve as any kind of a coach or assistant coach
 7 at that point in time and place?
 8 A. Specifically I don't remember, but he was, he would take
 9 part in our practices, our scrimmages.
 10 Q. Who was your coach then?
 11 A. We had, for when?
 12 Q. Basketball in high school.
 13 A. In high school? It would be, we had [REDACTED], we had
 14 [REDACTED], we had [REDACTED] I don't recall the other
 15 coaches, I can't remember.
 16 Q. Do you recall any of these others accompanying you or
 17 Mr. Kuhn or Patrick O'Donnell to the cabin?
 18 A. No.
 19 Q. Okay. Any of these other people abuse you?
 20 A. No.
 21 Q. Did you ever seek any medical care or treatment for
 22 having a sore behind all the time?
 23 A. No.
 24 Q. Did you ever talk to your mom or dad about it?
 25 A. Absolutely not.

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1 Q. Why not?
 2 A. I, I just didn't know any better. I didn't know what
 3 was going on. I didn't know anything. I just knew that
 4 O'Donnell gave me affection and I liked it. I thrived on
 5 his acceptance and his affection.
 6 Q. And when he left the community did you feel let down at
 7 that point?
 8 A. Yeah.
 9 Q. Did that cause you depression?
 10 A. Maybe a little.
 11 Q. What kind of a student were you in high school?
 12 A. Average.
 13 Q. What, 2 point, I don't know how they grade it there, was
 14 that on a letter basis or a point scale or --
 15 A. It was letter and point. I was all over the place. I
 16 seemed to excel in art, and as my high school years went on
 17 I had a very, very difficult time with male teachers. I
 18 would say as an authority figure I seemed to do better with
 19 my art teacher who was female, and I also worked in the
 20 library for a time. She was female.
 21 You know, I took, we had to take home ec, she was a
 22 female, but in regard to male teachers I, I didn't do very
 23 well.
 24 Q. Do you remember the name of your art teacher?
 25 A. [REDACTED].

1 Q. And did you ever see him abused?
 2 A. No, I don't think so.
 3 Q. And is this a basis for your belief that you just
 4 expressed based on some conversation with him or what?
 5 A. Based on my parents still living, residing in [REDACTED]
 6 as well as a lot of the parents of these individuals, and
 7 speaking to them and knowing them for 30 years, and things
 8 I've heard about [REDACTED] and his brother [REDACTED] and other
 9 individuals as well.
 10 Q. So this is based on information that was communicated
 11 ostensibly by the parents of the four individuals you have
 12 identified here to your own parents, is that right, as
 13 opposed to some personal communication with you?
 14 A. Correct, and people I've spoken to since this has all
 15 come about, about a couple of these individuals, how they
 16 are doing and how these other individuals believe it's
 17 affected their lives because --
 18 Q. Have you spoken to any of the four individuals yourself?
 19 A. I've spoken to [REDACTED]
 20 Q. And that's it?
 21 A. And I've reached out to others to speak to them and they
 22 have not returned my calls.
 23 Q. So you have called them?
 24 A. Yeah.
 25 Q. And wanting them to be part of the lawsuit?

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1 Q. Any relation to [REDACTED]?
 2 A. Correct, his wife.
 3 Q. And who was the librarian?
 4 A. [REDACTED].
 5 Q. And the home ec teacher?
 6 A. [REDACTED] I believe.
 7 Q. Now in your answers to interrogatories it indicates that
 8 you indicate and identify the following individuals as
 9 persons who may have knowledge to support your claim as set
 10 forth in your complaint, and you identified [REDACTED],
 11 [REDACTED], [REDACTED], and [REDACTED].
 12 Showing you your response to interrogatory No. 18, are
 13 those the names listed there?
 14 A. Correct.
 15 Q. Can you tell me how they to your knowledge support any
 16 specific claim you have in your complaint?
 17 A. [REDACTED] knew I spent a lot of time with O'Donnell,
 18 they all did. [REDACTED] I believe now could be a
 19 plaintiff in this if it wasn't for the fact that his family
 20 is strong Catholic, and they don't wish to suffer, I can't
 21 put words in their mouths, but they don't wish to suffer the
 22 humiliation of this action.
 23 Q. Did he, referring to [REDACTED] did he ever see you
 24 abused?
 25 A. I don't believe so. I don't know.

1 A. Kind of checking on them to see how they are doing, not
 2 to persuade them one way or another. It's, it's not my job
 3 to do that.
 4 It's, I know in my mind somehow, some way these
 5 individuals may have been affected somehow, and I just
 6 wanted to reach out to them. I just wanted to see how they
 7 were doing, just --
 8 Q. You know this based upon information that was
 9 communicated to you by your parents, by parents of these
 10 individuals, is that right?
 11 A. I know that during the time that O'Donnell was in
 12 [REDACTED] these individuals spent some time with him also, and
 13 I don't know what the extent of, if any, what happened, but
 14 I've heard things about a couple of these people that they
 15 are not coping well in society today.
 16 Q. Okay, and so based on that you assume that somehow they
 17 had been molested?
 18 A. I wouldn't assume that they have been molested, I just
 19 assume that they, something is not right with them. It is
 20 not for me to, I'm not an expert or anybody, I just think
 21 that they are having a hard time dealing with life, and I
 22 just want to reach out to them in whatever way I could.
 23 Q. Who have you spoken to regarding [REDACTED] on
 24 [REDACTED] or [REDACTED]? I guess it's [REDACTED]?
 25 A. I have spoken to a man named, I'm not sure if I can